

To: Field, Stephen[Field.Stephen@epa.gov]
From: Kier, Lori
Sent: Mon 2/3/2014 6:12:32 PM
Subject: FW: Requirements to Prevent Storage Tank Spills in Industrial Stormwater Permits

Not sure if this chain of emails is relevant to your work on the WV chemical spill issues, but I thought I'd forward in case it's helpful. (I think you told me that you were the keeper of water-related issues, but feel free to forward to others if that's not the case).

Lori Kier

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From: Stone, Chris <Chris.Stone@ct.gov>
Sent: Monday, February 03, 2014 9:22 AM
To: STORMWATER
Subject: RE:[stormwater] Requirements to Prevent Storage Tank Spills in Industrial Stormwater Permits

In CT, we spell out the secondary containment requirements in our industrial general permit. Containment means the ability to store 110% of the entire volume with no release of material. We also address containment issues for mobile storage. Our inspectors do look at containment when they visit a site.

You can find all of our stormwater permits and guidance at
www.ct.gov/deep/stormwater.

From: Farris, Erika D. [mailto:Farris.Erika@epa.gov]
Sent: Friday, January 31, 2014 10:33 AM
To: STORMWATER
Subject: [stormwater] Requirements to Prevent Storage Tank Spills in Industrial Stormwater Permits

Hello All

I am trying to find out whether any state-issued industrial stormwater permits have requirements that are intended to prevent direct discharges from storage tank spills, like what happened with the West Virginia chemical spill earlier this month. For example:

- Do any state-issued industrial stormwater permits have requirements for regular testing and/or inspection of storage tanks by the facility?
- Are secondary containment requirements in the industrial stormwater permit focused only on preventing contamination of *stormwater* from a spill, or are the secondary containment requirements also intended to contain the contents of the entire storage tank in order to prevent a direct discharge of the spill material?
- Do stormwater inspections by the state typically look at the structural integrity of storage tanks, and does the stormwater permit give you the authority to enforce if there are issues with the storage tanks?

If you have any information to share with me, please let me know.

Thank you!

Erika Farris

U.S. Environmental Protection Agency
Office of Wastewater Management

202-564-7548

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